

EXHIBIT "A"

IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF VERMONT

ALBIN MELI, <i>et al.</i>	)	
	)	
Plaintiffs,	)	
	)	
v.	)	Civil Action No. 2:19–CV–71
	)	
CITY OF BURLINGTON, VERMONT,	)	
<i>et al.</i> ,	)	
	)	
Defendants.	)	

**REVISED DISCOVERY SCHEDULE/ORDER**

The parties submit the following Discovery Schedule pursuant to Local Rule 26(a)(2):

**INTRODUCTION**

1. In this case, discovery maybe needed on the following subjects:

All claims and defenses raised in Plts.’ Complaint and Defs.’ Answer.

Unless noted here to the contrary and in more detail, discovery in this matter shall not be conducted in phases or limited to particular, enumerated issues.

2. The parties have conferred about disclosure, discovery, and preservation of electronically stored information (“ESI”). Unless noted otherwise, ESI shall be produced in the following format(s): native format or .pdf.
3. The parties have conferred about claims of privilege and claims of protection as trial-preparation materials. The parties have agreed on the following procedure to assert these claims after production: privilege log.
4. Any changes in the limitations on discovery imposed under the Federal Rules of Civil Procedure or the Local Rules for this District shall be specifically described below. \

DEADLINES

5. The parties shall serve initial disclosures pursuant to Fed. R. Civ. P. 26(a)(1) on or before 08/27/2019.
6. The parties shall serve all interrogatories and requests for production on or before 09/27/2019.
7. Depositions of all non-expert witnesses shall be completed by 07/14/2021.
8. Plaintiff shall submit expert witness reports on or before 09/01/2020.<sup>1</sup>  
Depositions of plaintiff's expert witnesses shall be completed by 07/14/2021.
9. Defendant shall submit expert witness reports on or before 03/01/2021.  
Depositions of defendant's expert witnesses shall be completed by 07/14/2021.
10. The Early Neutral Evaluation session shall be conducted on 7/23/2020 at 09:00 a.m. The parties have agreed that Michael Marks will serve as the nearly neutral evaluator. (Note: Paragraph 10 only applies to ENE-eligible cases pursuant to Local Rule No. 16.1.)
11. The parties shall serve all requests for admission on or before 01/15/2021.
12. All discovery shall be completed by 07/14/2021(no later than 8 months after filing of the Answer or Third-Party Answer).
13. Motions for joinder of parties and amendments to the pleadings shall be filed on or before 09/01/2019.
14. Motions, including summary judgment motions but excluding motions relating to the conduct of the trial, shall be filed on or before 07/01/2021.
15. This case shall be ready for trial by 11/01/2021.

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<sup>1</sup> On or before January 4, 2021, Plaintiffs may disclose an additional vocational rehab expert; Defendants to disclose vocational rehab expert February 4, 2021; and parties shall complete depositions of these experts by April 1, 2021.

**APPROVED AND SO ORDERED:**

/s/ William K. Sessions III

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U.S. District Judge

Date: June 21, 2021

Local Form/Rule 26(a)(3)